

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,

Plaintiff,

-against-

BLOOMBERG L.P.,

Defendant.

-----x07-CV-8383 (LAP)(HP)
JILL PATRICOT, TANYS LANCASTER,
JANET LOURES, MONICA PRESTIA,
MARIA MANDALAKIS, and MARINA KUSHNIR

Plaintiff-Intervenors,

-against-

BLOOMBERG L.P.,

Defendant.

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**DECLARATION OF CHRISTINE J. BACK IN OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT AS TO TIME-BARRED CLAIMS**

Christine J. Back declares under penalty of perjury:

1. I am an attorney for the Equal Employment Opportunity Commission ("EEOC") and have personal knowledge of the facts set forth in this Declaration. I submit this Declaration in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment as to Time-Barred Claims.
2. Attached as Exhibit 1 is a true and accurate copy of the Stipulation between EEOC and Defendant Bloomberg L.P. ("Defendant") executed on March 2, 2010.

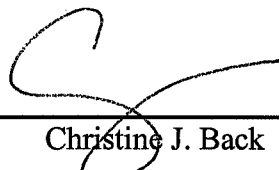
3. Attached as Exhibit 2 is a true and accurate copy of the charge of discrimination that Jill Patricot filed with the EEOC on March 24, 2006.
4. Attached as Exhibit 3 is a true and accurate copy of the charge of discrimination that Tanys Lancaster filed with the EEOC on May 9, 2006.
5. Attached as Exhibit 4 is a true and accurate copy of the charge of discrimination that Janet Loures filed with the EEOC on October 27, 2006.
6. Attached as Exhibit 5 is a true and accurate copy of the charge of discrimination that Maria Mandalakis filed with the EEOC on January 30, 2008.
7. Attached as Exhibit 6 is a true and accurate copy of the Second Amended Complaint filed by EEOC in this action on March 31, 2009.
8. Attached as Exhibit 7 is a true and accurate copy of EEOC's Second Amended Objections and Responses to Defendant's Fifth Set of Interrogatories to EEOC, dated March 26, 2010.
9. Attached as Exhibit 8 is a true and accurate copy of excerpts from the deposition of claimant Sofia Fernandez, taken on March 4, 2009.
10. Attached as Exhibit 9 is a true and accurate copy of excerpts from the deposition of claimant Laura Hutchinson, taken on April 7, 2009.
11. Attached as Exhibit 10 is a true and accurate copy of excerpts from the deposition of claimant Noelle McGowan, taken on May 12, 2009.
12. Attached as Exhibit 11 is a true and accurate copy of excerpts from the deposition of claimant Melissa Mendel, taken on May 14, 2009.
13. Attached as Exhibit 12 is a true and accurate copy of excerpts from the depositions of claimant Sharon Rochford, taken on October 29, 2008 and August 6, 2009.

14. Attached as Exhibit 13 is a true and accurate copy of excerpts from the deposition of claimant Mary Beth Sandell, taken on April 14, 2009.
15. Attached as Exhibit 14 is a true and accurate copy of excerpts from the depositions of claimant Jennifer Sullivan, taken on August 14, 2008 and July 23, 2009.
16. Attached as Exhibit 15 is a true and accurate copy of excerpts from the deposition of claimant Juliann Walsh, taken on December 12, 2008.
17. Attached as Exhibit 16 is a true and accurate copy of excerpts from the deposition of claimant Ketel Wrobel, taken on June 29, 2009.
18. Attached as Exhibit 17 is a true and accurate copy of excerpts from the deposition of claimant Marcia Barros, taken on July 28, 2009.
19. Attached as Exhibit 18 is a true and accurate copy of excerpts from the depositions of claimant Sarita Bhat, taken on March 6, 2009 and September 2, 2009.
20. Attached as Exhibit 19 is a true and accurate copy of excerpts from the deposition of claimant Renee Marcus, taken on August 14, 2009.
21. Attached as Exhibit 20 is a true and accurate copy of excerpts from the deposition of claimant Tannia Munroe, taken on April 23, 2009.
22. Attached as Exhibit 21 is a true and accurate copy of excerpts from the deposition of claimant Jenna Potosky, taken on July 22, 2009.
23. Attached as Exhibit 22 is a true and accurate copy of excerpts from the deposition of claimant Christine Staiti, taken on May 6, 2009.
24. Attached as Exhibit 23 is a true and accurate copy of excerpts from the deposition of claimant Maria Balzarano, taken on January 8, 2009.

25. Attached as Exhibit 24 is true and accurate copy of a letter from Electra Yourke to Thomas Golden, Esq., dated February 6, 2008.
26. Attached as Exhibit 25 is a true and accurate copy of the Determination of the Charge (also commonly known as Letter of Determination or LOD) of Maria Mandalakis by District Director Spencer H. Lewis, Jr., dated June 16, 2008.
27. Attached as Exhibit 26 is a true and accurate copy of EEOC's Objections and Responses to Defendant's Third Set of Interrogatories to EEOC, dated December 12, 2008.
28. Attached as Exhibit 27 is a true and accurate copy of excerpts from the 30(b)(6) deposition of Bloomberg employee Kate Wheatley, dated June 9, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2010
New York, New York



Christine J. Back